

REMARKS

Applicant respectfully requests reconsideration of the present application in view of the foregoing amendments and in view of the reasons that follow.

Claims 32, 42 and 44 are currently being amended.

This amendment adds, changes and/or deletes claims in this application. A detailed listing of all claims that are, or were, in the application, irrespective of whether the claim(s) remain under examination in the application, is presented, with an appropriate defined status identifier.

After amending the claims as set forth above, claims 32, 35, 37-42, 44-47, 49, 51-55 remain pending in this application.

Applicant appreciates the indication of allowable subject matter in claim 44. Applicant has rewritten claim 44 in independent form. Applicant notes that not all of the limitations of the base claim are necessary for the patentability of claim 44 and that amended claim 44 does not include all of the limitations of the base claim. Independent claim 44 is now in condition for allowance.

Applicant has amended claims 32 and 42 to correct minor informalities.

Claims 32, 35, 37-38, 40-42, 45-47, 49, 51-52 and 54-55 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,708,045 to Lieu et al. (hereinafter "Lieu") in view of U.S. Patent No. 6,282,086 to Loh et al. (hereinafter "Loh"). Applicant respectfully traverses this rejection for at least the following reasons.

Embodiments of the present invention relate to multi-mode modem cards and systems comprising such cards. According to embodiments of the invention, a multi-mode modem card comprises a primary modem card and an interface configured to receive a secondary modem card. Further, the multi-modem card includes an interface device configured to interface the

primary and secondary modem cards with a host processor. In this regard, the multi-mode modem card may be capable of allowing a host device to communicate with two wireless systems.

The cited references neither teach nor suggest these features. The Examiner relies on Lieu as the primary reference for the rejections. Applicant respectfully disagrees with the Examiner's interpretation of the disclosure of Lieu and submits that Lieu is irrelevant with respect to the pending claims.

Applicant notes that Lieu in no way relates to multi-modem cards. Rather, Lieu relates to the reconfiguring or upgrading of a radio card or a wireless terminal, such as a cellular telephone. In support of the rejection, the Examiner cites Lieu as disclosing a device "capable of communicating in multiple communication systems i.e. wireline or wireless" Office Action dated April 4, 2007, page 2. In this regard, the Examiner points to Lieu at col. 3, lines 32-43. However, the cited passage does not relate to "communicating in multiple communication systems". Rather, as described more clearly with reference to Figures 5 and 6 of Lieu, the wireless and wireline interfaces are adapted to communicate with a single device, the wireless terminal 502.

Further, there is no disclosure in Lieu of "an interface device configured to interface the primary and secondary modem cards with a host device," as recited in each of independent claims 32 and 42. As seen most clearly in Figure 6 of Lieu, the system of Lieu includes no such interface device.

Thus, Lieu fails to teach or suggest at least these features of the claimed invention. Loh fails to cure these deficiencies of Lieu. Loh merely relates to a mechanical receptacle arrangement for receiving cards. There is no disclosure in Loh of communication with a first communication system and a second communication system or of any interface devices.

Since none of the cited references teach or suggest at least the above-noted features of independent claims 32 and 42, the Office Action fails to establish a *prima facie* case of obviousness. Accordingly, claims 32 and 42 are patentable. Claims 35, 37-38, 40 and 41 depend, either directly or indirectly, from allowable claim 32 and are, therefore, patentable for at least that reason, as well as for additional patentable features when those claims are considered as a whole. Similarly, claims 45-47, 49, 51-52 and 54-55 depend, either directly or indirectly, from allowable claim 42 and are, therefore, patentable for at least that reason, as well as for additional patentable features when those claims are considered as a whole.

Claims 39 and 53 were rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lieu in view of Loh and further in view of U.S. Patent Publication No. 2002/0077814 to Garudadri et al. Claim 39 depends from allowable claim 32, and claim 53 depends from allowable claim 42. Therefore, claims 39 and 53 are patentable for at least that reason, as well as for additional patentable features when those claims are considered as a whole.

Applicant believes that the present application is now in condition for allowance. Favorable reconsideration of the application as amended is respectfully requested.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

The Commissioner is hereby authorized to charge any additional fees which may be required regarding this application under 37 C.F.R. §§ 1.16-1.17, or credit any overpayment, to Deposit Account No. 19-0741. Should no proper payment be enclosed herewith, as by a check or credit card payment form being in the wrong amount, unsigned, post-dated, otherwise improper or informal or even entirely missing, the Commissioner is authorized to charge the unpaid amount to Deposit Account No. 19-0741. If any extensions of time are needed for timely acceptance of papers submitted herewith, Applicant hereby petitions for such extension under 37

C.F.R. §1.136 and authorizes payment of any such extensions fees to Deposit Account No. 19-0741.

Respectfully submitted,

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